

Randall A. Pulman – State Bar No. 16393250
Anna K. MacFarlane – State Bar No. 24116701
PULMAN CAPPUCCIO & PULLEN, LLP
2161 NW Military Hwy., Suite 400
San Antonio, Texas 78213
Telephone: (210) 222-9494
Facsimile: (210) 892-1610
rpulman@pulmanlaw.com
amacfarlane@pulmanlaw.com

COUNSEL FOR JAMES E. GOODMAN

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

GOODMAN NETWORKS, INC.,	§	Case No. 22-31641 (MVL)
	§	
<i>Debtor.</i>	§	
	§	
	§	Chapter 7

**JAMES E. GOODMAN’S RESPONSE TO TRUSTEE’S OBJECTION TO
PROOF OF CLAIM 41-2 FILED BY JAMES GOODMAN**

James E. Goodman (“J.E. Goodman”) by and through his counsel Pulman, Cappuccio & Pullen, LLP, files this Response to the Trustee’s Objection to Proof of Claim 41-2 Filed by James Goodman [Doc. # 601], and in support hereof respectfully shows the Court as follows:

SUMMARY

J.E. Goodman’s Proof of Claim 41-2 only specifically requests indemnification for costs associated with the lawsuit brought by Arris Solutions, Inc., which is pending under Adversary Proceeding No. 23-03035 (the “Arris Adversary”) after removal from state court.¹ The Trustee has not brought any breach of fiduciary duty claims against J.E. Goodman in the Arris Adversary. J.E. Goodman acknowledges that the Trustee has brought his own breach of fiduciary duty claims

¹ The Arris Adversary has been abated.

against J.E. Goodman in Adversary Proceeding No. 24-03039, but resolution of Proof of Claim No. 41-2 only specifically pertains to claims brought in the Arris Adversary, for which J.E. Goodman is entitled to indemnification. The Trustee's claim objection should be overruled.

I. JURISDICTION AND VENUE

1. J.E. Goodman admits the allegations in paragraph 1.

II. BACKGROUND

2. J.E. Goodman admits the allegations in paragraph 2 but denies that he owns any interest in JJC & People, LLC.

3. J.E. Goodman admits the allegations in paragraph 3.

4. J.E. Goodman denies the allegations in paragraph 4.

5. J.E. Goodman admits the allegations in paragraph 5.

6. J.E. Goodman admits the allegations in sentences 1-3 of paragraph 6. J.E. Goodman denies participation in transactions that violated his fiduciary duties to Goodman Networks, Inc. J.E. Goodman admits the allegations in the final sentence of paragraph 6.

7. J.E. Goodman admits that the Trustee instituted an adversary proceeding against J.E. Goodman on June 7, 2024, and further admits that the Trustee's complaint contains the allegations generally described in paragraph 7. J.E. Goodman denies liability for the Trustee's claims and denies that this adversary proceeding is relevant to Proof of Claim 41-2, which only specifically requests indemnification for costs related to the Arris Adversary.

8. Paragraph 8 contains no allegations.

III. ARGUMENT

9. Paragraph 9 contains statements of law to which no response is required.

10. Paragraph 10 contains statements of law to which no response is required.

11. J.E. Goodman admits that the Trustee seeks the relief described in paragraph 11 but denies that the Trustee is entitled to any relief.

12. Proof of Claim No. 41-2 only specifically seeks indemnification for costs related to the Arris Adversary and does not relate to the Trustee's breach of fiduciary duty claims against J.E. Goodman. The Trustee's objection to Proof of Claim 41-2 should be overruled in its entirety.

WHEREFORE, J.E. Goodman respectfully requests that the Court overrule the Trustee's Objection to Proof of Claim 41-2 filed by J.E. Goodman, and grant J.E. Goodman such other and further relief to which he may be entitled.

Respectfully submitted,

PULMAN, CAPPuccio & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
www.pulmanlaw.com
(210) 222-9494 Telephone
(210) 892-1610 Facsimile

By: /s/ Randall A. Pulman

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rpulman@pulmanlaw.com
Anna K. MacFarlane
Texas State Bar No. 24116701
amacfarlane@pulmanlaw.com

ATTORNEYS FOR JAMES E. GOODMAN, JR.

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of October, 2024, a true and correct copy of the foregoing document was served by the Court's ECF noticing system on all parties that consent to such service via electronic filing.

/s/ Randall A. Pulman
Randall A. Pulman